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9 Attorneys for Plaintiffs

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11 **UNITED STATES DISTRICT COURT**
12 **FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

13 AUTOMOTIVE MACHINISTS PENSION
14 TRUST FUND,

15 Plaintiff,

16 NO. CV04-2514L

17 v.

18 **STIPULATION AND ORDER**
19 **FOR EXTENSION OF CASE**
20 **DEADLINES**

21 Defendant.

22 **I. STIPULATION**

23 COME NOW THE PARTIES, by and through their respective counsel of
24 record, and hereby stipulate as follows:

25 The parties have been engaged in settlement discussions regarding the above-
26 captioned matter and another matter involving the same parties and similar issues
27 under Cause No. 04-2200. The parties recently settled the matter under Cause No.
28 04-2200.

29
30 **STIPULATION AND ORDER FOR**
31 **EXTENSION OF CASE DEADLINES - 1**

1 The parties have engaged in limited discovery in the above-captioned matter
 2 and in the matter No. 04-2200 to minimize costs and fees while the parties discussed
 3 settlement. The parties believe that a four-month extension of the deadlines in the
 4 above-captioned matter is necessary and appropriate to enable to the parties to
 5 engage in additional discovery and additional settlement efforts that may obviate the
 6 need for a trial.

7 The parties stipulate to entry of the following order extending the current
 8 deadlines by four months.

9 DATED this 17th day of August, 2005.

10 s/ Mark E. Smith

11 Mark E. Smith, WSBA #30924
 12 SMITH McKENZIE ROTHWELL
 13 & BARLOW, P.S.
 14 Attorneys for Plaintiffs

15 s/ Paul M. Nordsletten

16 Paul M. Nordsletten, WSBA #21104
 17 DAVIS GRIMM PAYNE & MARRA
 18 Attorneys for Defendants

II. ORDER

19 Based on the foregoing stipulation of the parties, IT IS HEREBY ORDERED
 20 that the following deadlines in this Court's Minute Order Setting Trial Date and
 21 Related Dates entered March 10, 2005 are extended as follows:

	<u>Current Deadline</u>	<u>New Deadline</u>
Discovery completed by	9/11/05	1/11/06
Add dispositive motions filed by and noted on the motion calendar no later than the Fourth Friday thereafter	10/11/05	2/11/06
Settlement conference per CR 39.1	11/10/05	3/11/06

STIPULATION AND ORDER FOR EXTENSION OF CASE DEADLINES - 2

1 no later than

2 Mediation per 39.1 no later than 12/10/05 4/10/06

3 Motions in limine filed by 12/12/05 4/12/06
4 and noted on motion calendar
5 seven judicial days thereafter

6 Agreed pretrial order due 12/28/05 4/28/06

7 Trial briefs and trial exhibits 1/4/06 5/4/06
8 due

9 Trial 1/9/06 5/9/06

10 DATED: August 22, 2005

11 

12 Robert S. Lasnik
13 United States District Judge

14 Presented by:

16 s/ Mark E. Smith

17 Mark E. Smith, WSBA #30924
SMITH McKENZIE ROTHWELL
18 & BARLOW, P.S.

19 Approved for entry:

21 s/ Paul M. Nordsletten

22 Paul M. Nordsletten, WSBA #21104
DAVIS GRIMM PAYNE & MARRA
23 Attorneys for Defendants

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STIPULATION AND ORDER FOR
EXTENSION OF CASE DEADLINES - 3

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